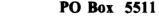
Emergency Services Communication System Advisory Committee









Lyle V. Gallagher, Chairman FCC MAIL RO

DOCKET FILE COPY ORIGINAL

December 20, 1994

William Caton **Acting Secretary FCC** 1919 M Street - Room 222 Washington, DC 20554

Mr. Caton:

The State of North Dakota's Emergency Services Advisory Committee who sets 9-1-1 Standards and Guidelines for all 9-1-1 operations hard line, as well as wireless, has reviewed FCC Docket 94-102.

Comments were requested and some of our committee member had concerns which are enclosed. Please make sure that all who have responsibilities in promulgating FCC Rules and Regulations receive copies of our comments and that they consider the impact that this new technology will have on 9-1-1 PSAP's in rural states, as well as urban areas.

Thank you for allowing our State to place our concerns and comments in the hands of those officials that make the FCC Rules and Regulations.

Sincerely.

Lyle V. Gallagher

State 9-1-1 Coordinator

c: Ronnie Rand, APCO

Robert Gurss, Wilkes, Artis, Hedrick & Lane, Attorneys At Law

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PHONE: 701-224-2127 FAX: 701-224-2126

RECEIVED DEC 23 1994

MEMORANDUM FCC MAIL ROOM

DATE:

DECEMBER 1, 1994

TO:

LYLE GALLAGER, STATE RADIO

FROM:

Rhonda Dukart, Consolidated Communications

SUBJECT: FCC PROPOSED 911 RULE MAKING

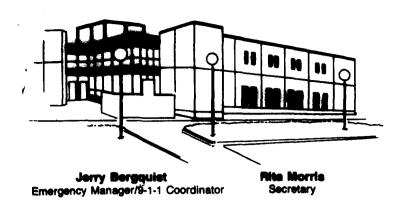
THIS MEMO IS DIRECTED AT THE PROPOSED RULE MAKING REGARDING SMR MOBILE RADIO PROVIDERS REQUIRED TO PROVIDE 911 LOCATION.

As a small business providing SMR trunked radio service, this requirement would cost me my business. After checking with my manufacturer on the cost of providing this information, I have been advised the estimate is \$400.00 per radio. Today I try and compete with cellular which gives its phones away for \$29.95 while my cost for a SMR mobile radio is \$795.00. If I am then required to add \$400.00 to that price, there is absolutely no way for me to compete with cellular.

Furthermore, the question arises:

- 1. Will all public safety agencies have the capability to read all the information?
- 2. Will the technology even be available to achieve the required location accuracy? Would anything less be useful?

Our hope is the FCC will distinguish between the cellular industry and the SMR trunked radio industry so we are not further pushed out of business by government regulations.



STUTSMAN COUNTY 9-1-1/EMERGENCY MANAGEMENT

LAW ENFORCEMENT CENTER

205 6th Street SE Jamestown, ND 58401 701-252-9093

November 14, 1994

Lyle Gallagher
ND State Radio
P.O. Box 5511
Bismarck, ND 58502-5511

MA CONTROLLED TO

Dear Lyle;

This letter is in regards to the proposed 9-1-1 rule making being looked at by the FCC. I'm in total agreement with making future PBX telephone equipment compatible for use with enhanced 9-1-1 systems. However, there are several proposed rules that the 9-1-1 Committee needs to discuss.

The first is a proposed rule regarding "Attendant Notification" (see page 13, item 23). This proposed rule would create the possibility of a 9-1-1 caller being on the phone with the PSAP operator and a "switchboard operator" at the same time. My concern would be in regards to the amount of confusion that could be generated from situations like this. The Committee needs to discuss the advantages and disadvantages regarding calls of this type and whether or not they should be allowed in the State of North Dakota.

The second is a proposed rule regarding "Station Number Identification (SNI)" (see page 13, item 26). This proposed rule establishes a minimum amount of information that would be provided to the PSAP. This information includes, a caller's telephone number, caller location identification, and a call-back number for use at the PSAP. The Committee needs to decide if this level of information should be considered the minimum or if additional information requirements should be adopted.

The third is a proposed rule regarding "Network Interface Standards" (see page 14, item 28). This proposed rule would allow PBX equipment to directly access the ALI database management system to input and update changes in station location records. Unless adequate security could be placed on the system, I would be opposed to such a system for fear that the integrity of the entire database could be jeopardized.

In relation to the proposed 9-1-1 rule making regarding wireless services, I'm in total agreement with making these services, such as cellular phones, compatible for use with enhanced 9-1-1 systems.

The Committee may want to discuss the proposed definition the FCC is considering to define which wireless services would be subject to compatibility requirements with enhanced 9-1-1 systems (page 18, item 38). The proposed definition is "mobile radio services offering access to real-time voice services provided on the public switched network".

I believe the FCC's three stage proposal to phase in location identification for wireless systems is reasonable. The five year phase in period should be sufficient time for wireless service providers to design the required systems.

Sincerely,

Jerry Bergquist 9-1-1 Coordinator